

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Yueting Jia<sup>1</sup>

Debtor.

Chapter 11

Case No. 19-12220 (KBO)

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICES**

**PLEASE TAKE NOTICE** that, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), the undersigned counsel enter their appearance as counsel for the creditors listed on Exhibit A (the “Clients”) in the above captioned case and request that all notices and other papers filed or served in the above-captioned case also be served upon:

Ballon Stoll Bader & Nadler PC Vincent J. Roldan 729 Seventh Avenue – 17 <sup>th</sup> Floor New York, NY 10019 212.575-7900 Fax 212.764-5060 vrolan@ballonstoll.com	The Rosner Law Group LLC Frederick B. Rosner Zhao (Ruby) Liu 824 N. Market Street, Suite 810 Wilmington, Delaware 19801 Tel: (302) 777-1111 Email: rosner@teamrosner.com liu@teamrosner.com
Grandall & Partners Consulting LLC Wenjie Sun 729 Seventh Avenue – 17 <sup>th</sup> Floor New York, NY 10019 347.822.4391 sunwenjie@grandall.com.cn	

**PLEASE TAKE FURTHER NOTICE** that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand,

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number is 8972. The Debtor’s mailing address is 91 Marguerite Drive, Rancho Palos Verdes, CA 90275.

motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronic filing, facsimile, or otherwise filed or made with regard to the referenced case and proceedings herein.

**PLEASE TAKE FURTHER NOTICE** that filing of this *Notice of Appearance and Request for Notices* shall not be deemed or construed to constitute a waiver of any substantive or procedural right of any of the Clients including, without limitation: (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Clients are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until the Clients expressly state otherwise, the Clients do not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: November 5, 2019  
Wilmington, Delaware

Respectfully submitted,

**THE ROSNER LAW GROUP LLC**

/s/ Zhao Liu  
Frederick B. Rosner (DE 3995)  
Zhao (Ruby) Liu (DE 6436)

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-and-

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*Attorneys for creditors listed on Exhibit A*